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Attorneys for Sinoenergy Corporation

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROBERT GRABOWSKI, on behalf of himself
and all others similarly situated,

Case No: 2:09-cv-2322-RCJ-RJJ

Plaintiff,

v.

TIANZHOU DENG, BO HUANG, ROBERT I.
ADLER, RENJIE LU, GREG
MARCINKOWSKI, BAOHENG SHI, XIANG
DONG YANG, SINOENERGY
CORPORATION and SKYWIDE CAPITAL
MANAGEMENT LIMITED,

**DEFENDANT SINOENERGY
CORPORATION'S STATEMENT
REGARDING REMOVAL**

Defendants.

Pursuant to this Court's Minute Order dated December 9, 2009, Defendant Sinoenergy Corporation ("Sinoenergy") states as follows:

1. The date(s) on which you were served with a copy of the complaint in the removed action.

ANSWER: Sinoenergy's Agent for Service of Process was served with a copy of the Complaint on November 19, 2009.

2. The date(s) on which you were served with a copy of the Summons.

ANSWER: Sinoenergy's Agent for Service of Process was served with a copy of the Summons on November 19, 2009.

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3. In removals based on diversity jurisdiction, the names of any served defendants who are citizens of Nevada, the citizenship of the other parties and a summary of defendant's evidence of the amount in controversy.

ANSWER: Not applicable.

4. If your notice of removal was filed more than (30) days after you first received a copy of the summons and complaint, the reason removal has taken place at this time and the date of your first received a paper identifying the basis for removal.

ANSWER: Not applicable.

5. In actions removed on the basis of the court's jurisdiction in which the action in state court was commenced more than one year before the date of removal, the reasons this action should not summarily be remanded to the state court.

ANSWER: Not applicable.

6. The name(s) of any defendant(s) known to have been served before you filed the notice of removal who did not formally join in the notice of removal and the reasons they did not.

ANSWER: At the time of the filing of the Notice of Removal, on December 8, 2009, Sinoenergy had no knowledge whether or not the other defendants had been previously served. Pursuant to 28 U.S.C. §§ 1453(b), Sinoenergy may remove actions commenced in state court to federal court without the formal consent of all defendants.

Dated this 23rd day of December, 2009.

McDONALD CARANO WILSON LLP

By: /s/ Jeffrey A. Silvestri

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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of McDonald Carano Wilson LLP and that on the 23rd day of December, 2009, a true and correct copy of the foregoing **DEFENDANT SINOENERGY CORPORATION'S STATEMENT REGARDING REMOVAL** was served on the parties to this case through electronic transmission of the Notice of Electronic Filing, which constitutes service of a document on Filing Users under the Court's Electronic Filing Procedures to all parties to this case who are Filing Users of the Electronic Filing System of the United States District Court for the District of Nevada.

/s/ Della Sampson

An employee of McDonald Carano Wilson LLP